

MIRANDA KANE (CSBN 150630)
 WILLIAM H. KIMBALL (CSBN 242626)
 JULIA M. BREYER (CSBN 284706)
 KANE +KIMBALL LLP
 803 Hearst Avenue
 Berkeley, CA 94710
 (510) 704-1400
 Email: mkane@kanekimball.com
 Email: wkimball@kanekimball.com
 Email: jbreyer@kanekimball.com

Attorneys for Marc H. Berger

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR-17-491-RS
)	
)	STIPULATION AND PROPOSED ORDER
v.)	SETTING SCHEDULE FOR PRE-TRIAL FILINGS
)	(AS MODIFIED BY THE COURT)
)	
)	
MARC HOWARD BERGER,)	
)	
Defendant.)	

In anticipation of the June 11, 2018 pre-trial conference in the above referenced matter, the parties agree and stipulate to the briefing schedule below, adapted from the Court's standing order regarding jury trials.

May 25, 2018:	Deadline to exchange proposed jury instructions
June 1, 2018:	Deadline to file motions <i>in limine</i>
June 6, 2018:	Deadline to file proposed jury instructions, juror questionnaires, voir dire questions, and verdict forms

STIPULATION AND ~~PROPOSED~~ ORDER
 RE SCHEDULE FOR PRE-TRIAL FILINGS (AS MODIFIED BY THE COURT)
 [CR-17-491-RS]

June 8, 2018: Deadline to file any responses to motions *in limine*

IT IS SO STIPULATED.

Respectfully submitted,

Dated: May 21, 2018

/s/
MIRANDA KANE
Kane + Kimball LLP
Attorneys for Defendant Marc H. Berger

Dated: May 21, 2018

/s/
ROBERT S. LEACH
Assistant United States Attorney

/s/
LORI A. HENDRICKSON
Trial Attorney
U.S. Department of Justice, Tax Division

~~PROPOSED~~ ORDER

The Court HEREBY ORDERS the following schedule for the parties' pre-trial filings.

May 25, 2018: Deadline to exchange proposed jury instructions

June 1, 2018: Deadline to file motions *in limine*

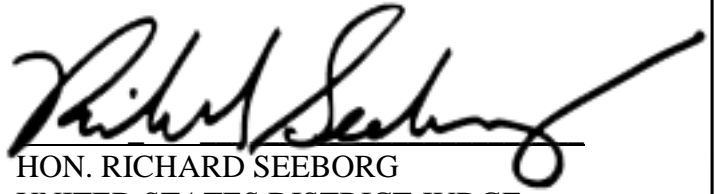
June 6, 2018: Deadline to file proposed jury instructions, juror questionnaires*, voir dire questions, and verdict forms

***The parties are expected to submit a jointly proposed jury questionnaire. Failure to agree on a questionnaire may result in proceeding without one.**

June 8, 2018: Deadline to file any responses to motions *in limine*

IT IS SO ORDERED.

Dated: May 21, 2018


HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE